FR Doc. 2011-28623 Filed 11/3/2011 Steven Harris-Scott Shscott15@gmail.com George Mason University Fairfax, VA 22030

Comment 1a: Are there steps that agencies could take to grow existing and new markets related to the access and analysis of peer-reviewed publications that result from federally funded scientific research?

Response: The ideal for me would be that the Federal government ensures that the complete collection of articles resulting from publicly funded research is made freely accessible to the public and that the public can fully use them without commercial restrictions. Students and scientists especially need full Open Access, immediate, free online availability coupled with rights to reuse fully. Full reuse allows innovation to thrive and helps U.S. companies to compete successfully on the global stage. Thousands of jobs could also be created with direct, easy and quick access to this new scientific research, all the more important in these tough economic times

Comment 1b: How can policies for archiving publications and making them publically accessible be used to grow the economy and improve the productivity of the scientific enterprise?

Response: Open Access allows research results to be quickly incorporated into the teaching and learning process – improving the quality of education quickly and cost-effectively. Professors can obviously only teach what they have access to. Open Access greatly improves students' ability to get a complete education. Furthermore, students lose access to the vast majority of research that is subscription-access only when they graduate. This impedes students' ability to stay current in their field and hinders their ability to hit the ground running when they put their education to work in the Academy or private sector. This cost is even greater in a weak economy where students may spend a significant amount of time in their job search. Strong public access policies help level the playing field for students outside of the wealthiest institutions, who are at a distinct disadvantage when it comes to building their education from the most up-to-date research. Open Access promotes diversity of follow-on research, and increases the pursuit of new research pathways. Open Access lets scientists incorporate new findings into their research faster. Opening access to research articles allows scientists to get to – and read more – information than they previously could. It also lets scientists use new tools to incorporate more articles into their research faster.

Comment 1c: What are the relative costs and benefits of such policies?

Response: I can't claim to know much about the costs of open access versus the benefits but I am guessing the benefits far outweigh the costs. The benefits are laid out above whereas the costs seem to be rather minimal according to some of my more informed colleagues.

Comment 1d: What type of access to these publications is required to maximize U.S. economic growth and improve the productivity of the American scientific enterprise?

Response: Access must be free, immediate, and coupled with the rights to reuse the articles fully. Restrictions reduce the return to taxpayers and access without reuse delivers only a fraction of the value. Broad re-use allows researchers to unlock additional value from research investment – now, and for decades. Also, access must be immediate to provide students with the most up-to-date education possible.

Comment 2: No Response

Comment 3: What are the pros and cons of centralized and decentralized approaches to managing public access to peer-reviewed scholarly publications that result from federally funded research in terms of interoperability, search, development of analytic tools, and other scientific and commercial opportunities? Are there reasons why a Federal agency (or agencies) should maintain custody of all published content, and are there ways that the government can ensure long-term stewardship if content is distributed across multiple private sources?

Response: I don't see much of a problem with encouraging public/private partnerships in the housing of these repositories. They must of course support access and use conditions that allow all interested parties to build on them, and to create new things on top of this publicly funded information. Still, the federal government is the most appropriate entity to provide permanent stewardship of these articles and is in a unique position to ensure that publicly funded articles are permanently preserved, made accessible, and useable. To ensure this, any public access policies that are developed must give the federal government adequate rights to archive and make distribute publicly funded articles.

Comment 4: No Response

Comment 5: No Response

Comment 6: How can Federal agencies that fund science maximize the benefit of public access policies to U.S. taxpayers, and their investment in the peer-reviewed literature, while minimizing burden and costs for stakeholders, including awardee institutions, scientists, publishers, Federal agencies, and libraries?

Response: For any public access policy to be successful, there must be consistency of requirements and mandates. Uniformity of deposit requirements will reduce the complexity and cost while at the same time, increase the rate of compliance.

Comment 7: Besides scholarly journal articles, should other types of peer-reviewed publications resulting from federally funded research, such as book chapters and conference proceedings, be covered by these public access policies?

Response: Educational materials that result from publicly funded research should be made readily accessible to the public. Other materials, such as book chapters, texts, conference proceedings should be made accessible, although the policies under which they are made accessible may need to differ from those directed at journal articles. Different conditions apply to different types of material and policies should reflect these differences. In no way should these policies jeopardize a researcher's agreement with publishers of his/her book, for example.

Comment 8: What is the appropriate embargo period after publication before the public is

granted free access to the full content of peer-reviewed scholarly publications resulting from federally funded research? Please describe the empirical basis for the recommended embargo period. Analyses that weigh public and private benefits and account for external market factors, such as competition, price changes, library budgets, and other factors, will be particularly useful. Are there evidence based arguments that can be made that the delay period should be different for specific disciplines or types of publications?

Response: Students want and need access now. It is unacceptable to ask our students to "make do" with old information. Furthermore, since courses are typically only 3 to 4 months long, an embargo necessarily means students are missing information that would provide them a more up-to-date education. Having said that, an embargo period where an author can determine a hard stop-date between 0-12 months has been proven effective across multiple disciplines and would be an acceptable compromise. No data has ever been provided by any publisher that I am aware of that this embargo period has harmed them or their bottom-line. An embargo of 12 months or less has been adopted by hundreds of journals so I tend to agree it would be an acceptable policy.